



June 12th, 2006
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
Monthly Report; May 1 – May 31, 2006 Reporting Period**

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from May 1 to May 31, 2006.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D. Smith", with a stylized flourish at the end.

Steven D. Smith
Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski- Monsanto
Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Status Report

Date of Report: June 12, 2006
Period Covered: May 1, 2006 – May 31, 2006

Work Performed During the Reporting Period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remains under review. Portions of the Plan applicable to the placement of sediments have been approved.*
- Performed inspections of the site.
- Maintained stormwater and leachate collection controls around the containment cell.
- Monitored support area facilities.
- The analytical results for the first quarter 2006 groundwater samples from the monitoring wells around the cell being reviewed.

Dead Creek

A final revised excavation plan for Sectors B, D, and F in Dead Creek, was submitted to the Agency on October 28, 2005. This work plan was approved on November 2, 2005.

An additional Work Plan was submitted on November 15th proposing the excavation of mercury impacted soils in CS – F and the Borrow Pit Lake (BPL). Revisions were made to the plan in response to EPA comments and the revised plan was verbally approved on December 5th. Written approval was received on December 21st.

The excavation contractor, PSC, began mobilizing to the site on November 7, 2005 and completed the planned excavation by the end of February 2006. The analytical results for all of the confirmation samples for all of the COPCs were received by the end of April and the COPC concentrations in all of the verification samples were below the relevant RBCs. Based on post excavation surveys, a total of 12,323 cubic yards of soils were removed from the creek bottom and the BPL and placed in the containment cell.

Construction of a new temporary cover on the containment cell was also completed by the end of March. The cover is identical to the previous one and consists of a layer of geotextile covered by a scrim-reinforced polyolefin membrane.

Grading the creek bottom between the end of CS-E at Parks College and the upstream end of CS-C was completed by the end of April. This promoted gravity drainage between some adjacent sections of the creek and allowed three of the six pumps in the creek to be removed.

In response to the IEPA's concern about residual concentrations of organic constituents leaching to the groundwater at concentrations in excess of the Illinois Class I groundwater standards, it was proposed that creek bottom soils in CS-E at Transect T16 be removed because of the presence of dieldrin in these soils and that confirmation samples be taken at transect T6 in CS-D and analyzed for the same constituent. It was also proposed that the creek bottom soils in CS-F at Transect T3 be sampled and analyzed for beta-BHC. The proposal was accepted by the Agency and the additional samples in CS-D and CS-F were obtained and analyzed. No dieldrin was detected in the CS-D sample. Similarly, no beta-BHC was detected in the CS-F sample. The planned excavation in CS-E will be carried out as soon as access agreements have been finalized with property owners.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Perform necessary operation and maintenance activities on the containment cell and temporary treatment system.
- Complete review of the analytical results of the first quarter 2006 groundwater samples from the monitoring wells around the containment cell.
- Collect second quarter groundwater samples from these monitoring wells.
- Continue to fund the City of Cahokia's operation of the creek dewatering system.
- Prepare a Technical Memorandum summarizing the additional excavation in Dead Creek and the Borrow Pit Lake for submission to the Agencies.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %